

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**DALLAS GARCIA, Individually and as §  
A representative of the Estate of FRED §  
HARRIS, deceased, §  
Plaintiff, §  
§  
v. § Civil Action No.: 4:22-cv-3093  
§  
§  
**HARRIS COUNTY, TX. and HARRIS §  
COUNTY SHERIFF'S OFFICE, §  
Defendants. §****

**DEFENDANT HARRIS COUNTY'S SECOND SUPPLEMENTAL DISCLOSURES**

TO: DALLAS GARCIA, Plaintiff, c/o Randall Kallinen and Alexander Johnson, Kallinen Law, PLLC, 511 Broadway Street, Houston, TX 77012.

In accordance with Federal Rule of Civil Procedure 26(a), Defendant HARRIS COUNTY (“Harris County” or “the County”) provides the following supplemental information:

**B. Documents That Support Claims or Defenses (Rule 26(a)(1)(A)(ii)):**

(1) Per the Confidentiality and Protective Order [Doc. #25], Harris County produces the following documents that have been redacted and marked as confidential:

000507	Video-Ownby escorted to 3rd Floor holding cell 10-29-21
000508	Video-Ownby and Harris in 3rd Floor holding cell 10-29-21
000509	Video-DO Area at 3rd Floor 10-29-21
000510	Video-DO Area at 3rdFloor 10-29-21
000511	Video-Harris exits Gen. Pop. 10-29-21
000512	Video-DO Area at 3rd Floor 10-29-21
000513	Video-Harris escorted to 3rd Floor holding cell 10-29-21
000514	Video-Harris in 3rd Floor Hallway 10-29-21
000515	Video-Harris placed in 3rd Floor holding cell 10-29-21
000516	Video-Harris escorted to 3rd Floor holding cell 10-29-21
000517	Video-DO Area at 3rd Floor 10-29-21
000518	Video-Ownby Assualts Harris 10-29-21
000519	Video-DO Area at 3rd Floor 10-29-21
000520	Video-DO Area at 3rd Floor 10-29-21
000521	Video-3rd Floor Elevator Lobby after assault by Ownby 10-29-21
000522	Video-removal of Harris out of holding cell after Ownby assault 10-29-21
000523	Video- D.O. area

000524	Video-elevator
000525	Video-Harris carried into/out of elevator
000526	Video-Medical Hallway
000527	Video-Medical Hallway
000528	Video-Medical Hallway
000529	Video-Medical area
000530	Video-Sally Port area
000531	Video-Sally Port area

(2) Harris County previously produced redacted copies of documents/evidence under bates ##HC\_F.Harris\_000001-000077; 000079; 000085-000136; 000142-000145; 000147-172; 000226-000235; 000293-000329; 000331-000498]

(3) Harris County previously identified the following documents that are in the possession, control and custody of third parties, which Plaintiff has equal access via subpoena:

- Houston Fire Department Patient Care Report-Incident #2110291094
- Texas Department of Public Safety Report #2021I-TRA-50080441
- Houston Police Department Offense Report #136767721
- The Harris Center for Mental Health and IDD
- University of Texas Medical Branch
- White Oaks Hospital

Respectfully submitted,

OF COUNSEL:

CHRISTIAN MENEFEET  
TEXAS BAR NO. 24088049  
HARRIS COUNTY ATTORNEY

Date: January 19, 2023.

By: /s/ Jennifer F. Callan  
 JENNIFER F. CALLAN  
 Assistant County Attorney  
 ATTORNEY-IN-CHARGE  
 State Bar No. 00793715  
 Fed. Bar No. 22721  
 Tel: (713) 274-5146 (direct)  
 Fax: (713) 755-8823  
[jennifer.callan@harriscountytx.gov](mailto:jennifer.callan@harriscountytx.gov)

GREGORY BURNETT  
Sr. Assistant County Attorney  
State Bar No. 24057785  
Fed. Bar No. 3785139  
Tel: (713) 274-5224 (direct)  
[gregory.burnett@harriscountytx.gov](mailto:gregory.burnett@harriscountytx.gov)

JAMES C. BUTT  
Sr. Assistant County Attorney  
State Bar No. 24040354  
Fed. Bar No. 725423  
Phone: (713) 274-5133 (direct)  
[james.butts@harriscountytx.gov](mailto:james.butts@harriscountytx.gov)

Harris County Attorney's Office  
1019 Congress  
Houston, Texas 77002

**Attorneys for Defendant Harris County**

## **CERTIFICATE OF SERVICE**

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause via email and regular mail:

Randall Kallinen  
Alexander Johnson  
Kallinen Law, PLLC  
511 Broadway Street  
Houston, TX 77012

*/s/ Jennifer F. Callan*  
Jennifer F. Callan